

EPA-R5-2015-002106-1

Carolyn Bury /R5/USEPA/US

09/09/2009 02:39 PM

To Peter Ramanauskas

cc Jose Cisneros

bcc

Subject Re: Fw: GLLA, Trenton Channel, Arkema Facility

Right. The Trenton Channel has PCB contamination, as well as a number of other contaminants. I'll keep you informed of progress. Currently finding my way around the logistics of meshing GLLA and CA. For the record, the Arekma East Plant, which is the plant which would be participating in the cleanup, is not a source of PCBs. As you are aware, the Arekema West Plant did have PCB releases which don't appear to have migrated off-site per the remedial plan that you approved.

Thanks.

Carolyn

Carolyn Bury

Environmental Scientist

RCRA Corrective Action Program

Land and Chemicals Division

U.S. EPA Region Five

77 W. Jackson Blvd. LU-9J

Chicago, IL 60604

312-886-3020

bury.carolyn@epa.gov

-----Peter Ramanauskas/R5/USEPA/US wrote: -----

To: Carolyn Bury/R5/USEPA/US@EPA

From: Peter Ramanauskas/R5/USEPA/US

Date: 09/09/2009 01:02PM

Subject: Fw: GLLA, Trenton Channel, Arkema Facility

Hi Carolyn,

Joe forwarded me the message below. Just wanted to touch base to see if you are aware whether this GLLA project addresses PCB contamination.

We're just trying to keep things coordinated on the PCB front with GLNPO.

Thanks,

Pete

----- Forwarded by Peter Ramanauskas/R5/USEPA/US on 09/09/2009 01:02 PM -----

From: Jose Cisneros/R5/USEPA/US

To: Peter Ramanauskas/R5/USEPA/US@EPA

Cc: Carolyn Bury/R5/USEPA/US@EPA

Date: 09/09/2009 12:52 PM

Subject: Fw: GLLA, Trenton Channel, Arkema Facility

Just an FYI. I think that this is a PCB contamination situation, but you might want to check with Carolyn. I think its good to stay aware of all of these projects. If it is, then this is one to track and luckily we are intimately involved at the site so that we should be able to control what is produced as a plan and how the clean-up is handled.

Thanks,

Joe

----- Forwarded by Jose Cisneros/R5/USEPA/US on 09/09/2009 12:50 PM -----

From: Carolyn Bury/R5/USEPA/US
To: DIANA MALLY/R5/USEPA/US@EPA
Cc: Jose Cisneros/R5/USEPA/US@EPA
Date: 09/09/2009 08:54 AM
Subject: GLLA, Trenton Channel, Arkema Facility

Hi Diana,

I am now PM for the Arkema facilities on the Trenton Channel, so please add me to the email list for any GLLA planning meetings for the project. I have been talking to Mike Pinto of Legacy Site Services, my counterpart at the facility, about how Corrective Action requirements and the GLLA work would mesh. Working somewhat in the dark, we came up with best-case and worst-case scenarios. Mike had some fundamental questions about logistics that I could not answer. For example, would there be a contract between the facility and the government (GLNPO), and what were the company's "guarantees" if it contributed its cost-share amount for a large project that the sediment associated with its facility would be remediated (that the money would not be spent before that portion of the project was completed). I need to sort out how CA obligations would be met through the LA project and some information on how GLNPO designs sediment remediation would be quite useful, if you could steer me towards a summary. I know about the ARCS numbers, but not how they are applied for GLLA.

Perhaps you could steer me towards any precedents for reference. Have other CA facilities participated in GLLA projects elsewhere? Can you send me basic information, say, what you might prepare for a party considering participating in a legacy project?

Thanks.

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EPA-R5-2015-002106-2

Carolyn Bury /R5/USEPA/US

09/14/2009 10:00 AM

To michael.pinto

cc

bcc

Subject Fw: Re: GLLA, Trenton Channel, Arkema Facility

-----Forwarded by Carolyn Bury/R5/USEPA/US on 09/14/2009 09:58AM -----

To: Carolyn Bury/R5/USEPA/US@EPA

From: DIANA MALLY/R5/USEPA/US

Date: 09/14/2009 09:01AM

cc: Jose Cisneros/R5/USEPA/US@EPA

Subject: Re: GLLA, Trenton Channel, Arkema Facility

Hi Carolyn,

Sorry I did not call you on Friday.

There is a good summary of the Great Lakes Legacy Act and rule at

<http://epa.gov/glnpo/sediment/legacy/rule/rfp.html>.

The work at the Arkema site would be under Category 3 or 4 depending where RCRA is in the investigation and cleanup process.

EPA would enter into a project agreement with Arkema which defines the project and establishes a project ceiling and cost share amount. There is no "guarantee" that the money would be spent at their project before the rest of the project is completed, but hopefully good definition of the scope and budget would alleviate this scenario and their concern.

We usually use the consensus-based probable effect concentrations (PECs) as baseline concentrations for our studies and designs. We would need to work together to determine some of the cleanup levels for the contaminants found at Arkema since they are somewhat unusual and do not have PECs developed for them.

I have attached a project agreement for a cleanup at the Ottawa River. The "PRPs" in the project area joined to sign with GLNPO.

Let me know if you have any questions. I will still try to call you this week, maybe after you have had a chance to look over the information, and would be happy to answer any questions. Thanks.

Diana

Carolyn Bury/R5/USEPA/US

Carolyn Bury/R5/USEPA/US

09/09/2009 08:54 AM

To

DIANA MALLY/R5/USEPA/US@EPA

cc

Jose Cisneros/R5/USEPA/US@EPA

Subject
GLLA, Trenton Channel, Arkema Facility

Hi Diana,

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Perhaps you could steer me towards any precedents for reference. Have other CA facilities participated in GLLA projects elsewhere? Can you send me basic information, say, what you might prepare for a party considering participating in a legacy project?

Thanks.
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bury.carolyn@epa.gov



Ottawa River PA - signed.PDF

EPA-R5-2015-002106-3

Carolyn Bury /R5/USEPA/US

09/30/2009 07:18 AM

To "McCabe, John (DEQ)"

cc "Montgomery, Delores (DEQ)", "Tyson, Kimberly (DEQ)",
"MacKenzie-Taylor, Deb (DEQ)"

bcc

Subject Re: FW: Arkema

I heard that the State was "giving back" the permit program but I don't know any details. Per Colleen's message, today marks some milestone for this process, a vote or something? A grim day for the program.

OK, the Detroit River is a navigable waterway so if the wetlands are jurisdictional and the State retains the program, this would be a joint wetlands permit. I'll inform the facility that they need to first perform a delineation and then make an application.

Thanks for the information.

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-----"McCabe, John (DEQ)" <MCCABEJ@michigan.gov> wrote: -----

To: Carolyn Bury/R5/USEPA/US@EPA
From: "McCabe, John (DEQ)" <MCCABEJ@michigan.gov>
Date: 09/30/2009 06:58AM
cc: "Montgomery, Delores (DEQ)" <MONTGOMERYD1@michigan.gov>, "Tyson, Kimberly (DEQ)" <TYSONK@michigan.gov>, "MacKenzie-Taylor, Deb (DEQ)" <MACKENZIE-TAYLORD@michigan.gov>
Subject: FW: Arkema

FYI concerning wetland permit requirements and Arkema cleanup.

John McCabe
Senior Environmental Quality Analyst
Hazardous Waste Program
Waste and Hazardous Materials Division
MDEQ
517-335-4789

-----Original Message-----

From: Okeefe, Colleen (DEQ)
Sent: Wednesday, September 30, 2009 7:51 AM
To: McCabe, John (DEQ)
Subject: RE: Arkema

Well, it will be interesting to see if we need to follow the nationwide general permit requirements of the USACE or Part 303, Wetlands Protection after today.....October 1st should tell us.

Today -- we would rely on Part 303, Wetlands Protection. Are the

wetlands greater than 5 acres in size or is there a stream or some kind of water body within the vicinity of the cleanup site? If so, the wetlands are most likely regulated. If they are unsure, I would suggest a wetland delineation be performed to determine if the wetlands are regulated. If they are not regulated wetlands, no permit may be required, but a wetland delineation would need to document that.

If the wetlands are regulated, they would most likely need a state general permit for regulated wetlands in a contaminated site. The USACE would not be involved unless it was in a Section 10 water (Great Lakes or navigable rivers so many miles from the Great Lake - we have a list). However, even if the USACE was involved, it would still require a permit from the state under Part 303, Wetlands Protection. Both agencies would require a permit.

So, first, they need to determine if the wetlands are regulated so a wetland delineation needs to be performed if uncertain.

Second, they should proceed to obtain a state wetland general permit. If the USACE is involved, we will copy them.

Does that help? That is all I can tell you for today. After today, we would have to rely on nationwide permitting.....What a mess!

-----Original Message-----

From: McCabe, John (DEQ)

Sent: Tuesday, September 29, 2009 10:40 AM

To: 'Bury.Carolyn@epamail.epa.gov'

Cc: Montgomery, Delores (DEQ); Tyson, Kimberly (DEQ);

Mazur.Daniel@epamail.epa.gov; Okeefe, Colleen (DEQ); MacKenzie-Taylor, Deb (DEQ)

Subject: RE: Arkema

Thanks for getting back so quickly, Carolyn. You pretty quickly exhausted my knowledge of wetland permitting, so I'm forwarding this note on to Colleen O'Keefe in our wetlands program (Thanks for your forbearance, Colleen) re: the NW #38 Nationwide Permit. My assumption is that, since Michigan administers its own wetlands program (at least for the time being) that the Nationwide Permits aren't in effect here and MI's regulations take precedence. Colleen--if there's someone else I should be talking to with these general questions, let me know. Thanks. John

John McCabe

Senior Environmental Quality Analyst

Hazardous Waste Program

Waste and Hazardous Materials Division

MDEQ

517-335-4789

-----Original Message-----

From: Bury.Carolyn@epamail.epa.gov [<mailto:Bury.Carolyn@epamail.epa.gov>]

Sent: Tuesday, September 29, 2009 10:28 AM

To: McCabe, John (DEQ)

Cc: Montgomery, Delores (DEQ); Tyson, Kimberly (DEQ);

Mazur.Daniel@epamail.epa.gov

Subject: Re: Arkema

Hi John,

Thanks for the information. I think that I can shed some light on this round-about discussion and speculation. I've been talking to Mike Pinto, my counterpart at Legacy Site Services about the site. During one conversation we discussed the fact that some wetlands had developed on the contaminated 92-acre parcel along the river. I told Mike about the ACOE Nationwide Permit #38 for Cleanup of Hazardous and Toxic Waste, and recommended that he look into whether that would be the type of permit needed at the site. It would seem that the consultant was using the incorrect term "exemption" and was probably in fact trying to figure out whether NW 38 is applicable in Michigan.

That's a good question. Do you know whether State approved/agreed to NW 38? I assume that the site is under ACOE jurisdiction because it is adjacent to a navigable waterway, correct?.

Thanks again.

Carolyn

Carolyn Bury
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Land and Chemicals Division
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Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

From: "McCabe, John (DEQ)" <MCCABEJ@michigan.gov>

To: Carolyn Bury/R5/USEPA/US@EPA

Cc: "Montgomery, Delores (DEQ)" <MONTGOMERYD1@michigan.gov>,
"Tyson, Kimberly (DEQ)" <TYSONK@michigan.gov>

Date: 09/29/2009 06:53 AM

Subject: Arkema

Carolyn,

I don't know if Dan Mazur passed this on to you but a consultant for the

Arkema site (which I understand is one of your projects) contacted him to ask about exemptions from wetland permitting requirements for sites undergoing RCRA cleanups. Dan told him that he didn't believe there were any such exemptions and recommended he talk to me for more detail about Michigan's wetland permitting program. The consultant never did contact me; my assumption is that he was aware of Michigan's requirements and was looking to do an end run around our permitting process. I am unfamiliar with whatever wetland work is proposed for this site but I would be happy to direct the facility and/or you to the appropriate wetlands program staff. Also, be advised that our wetlands program, while still requiring permits for work in regulated wetlands, does have an expedited permitting category for remediation projects. Let me know if I can be of any help with this issue.

John

John McCabe
Senior Environmental Quality Analyst
Hazardous Waste Program
Waste and Hazardous Materials Division
MDEQ
517-335-4789

EPA-R5-2015-002106-4

Carolyn Bury /R5/USEPA/US

10/28/2009 02:31 PM

To Michael PINTO

cc

bcc

Subject Re: East Plant Waste

Mike, thanks. Did any of these processes occur at the West Plant?

Carolyn

Carolyn Bury

Environmental Scientist

RCRA Corrective Action Program

Land and Chemicals Division

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-----Michael PINTO <michael.pinto@total.com> wrote: -----

To: Carolyn Bury/R5/USEPA/US@EPA

From: Michael PINTO <michael.pinto@total.com>

Date: 10/28/2009 02:26PM

Subject: East Plant Waste

Ms. Bury,

After reviewing the applicability of the Federal and State RCRA rules, it appears that the soils on the East Plant Site are only considered a regulated hazardous waste if they fit into the following categories:

1) RCRA F-list Waste - F020 through F023, F026 and F027.

F020 Wastes, except wastewater and spent carbon from hydrogen chloride purification, from the production or manufacturing use as a reactant, chemical intermediate, or component in a formulating process, of tri- or tetrachlorophenol or of intermediates used to produce their pesticide derivatives . This listing does not include wastes from the production of hexachlorophene from highly purified 2,4,5-trichlorophenol

F021 Wastes, except wastewater and spent carbon from hydrogen chloride purification, from the production or manufacturing use as a reactant, chemical intermediate, or component in a formulating process of pentachlorophenol or of intermediates used to produce its derivatives .

F022 Wastes, except wastewater and spent carbon from hydrogen chloride purification, from the manufacturing use as a reactant, chemical intermediate, or component in a formulating process of tetra-, penta-, or hexachlorobenzenes under alkaline conditions

F023 Wastes, except wastewater and spent carbon from hydrogen chloride purification, from the production of materials on equipment previously used for the production or manufacturing use as a reactant, chemical intermediate, or component in a formulating process of tri- and tetrachlorophenols . This listing does not include wastes from equipment used only for the production or use of

hexachlorophene from highly purified 2,4,5-trichlorophenol

F026 Wastes, except wastewater and spent carbon from hydrogen chloride purification, from the production of materials on equipment previously used for the manufacturing use as a reactant, chemical intermediate, or component in a **formulating process of tetra-, penta-, or hexachlorobenzene under alkaline conditions**

F027 **Discarded unused formulations containing tri-, tetra-, or pentachlorophenol or discarded unused formulation containing compounds derived from these chlorophenols** . This listing does not include formulations containing hexachlorophene synthesized from prepurified 2,4,5-trichlorophenol as the sole component

2) MI Part 111 Table 202 Severely Toxic Characteristic Wastes

From Rule 212:

"(5) A waste exhibits the characteristic of severe toxicity if the waste contains **1 part per million** or more of a severely toxic substance listed in table 202."

Table 202

Michigan Hazardous Waste Number	Substance
001S	Aflatoxin
002S	2,3,7,8-Tetrachlorodibenzo-p-dioxin
003S	1,2,3,7,8-Pentachlorodibenzo-p-dioxin
004S	1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin
005S	1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin
006S	1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin
007S	2,3,7,8-Tetrachloridibenzo furan

Since the specific source of the dioxins at the East Plant is unknown and the processes described above did not occur on the East Plant, LSS anticipates that excavated soil at the site will be considered non-hazardous solid waste unless it exhibits the characteristic of severe toxicity as defined in MI Part 111 above. Sampling performed to date has indicated that the soil does not contain 1 ppm or above of the substances listed in Table 202. Therefore we expect that waste soil generated as part of a future remedy can be handled as non-hazardous waste.

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439

EPA-R5-2015-002106-5

Carolyn Bury /R5/USEPA/US

10/28/2009 02:49 PM

To Michael PINTO

cc

bcc

Subject Re: East Plant Waste

You see the potential issue as the sites are still under one order . . .

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Program
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bury.carolyn@epa.gov

-----Michael PINTO <michael.pinto@total.com> wrote: -----

To: Carolyn Bury/R5/USEPA/US@EPA
From: Michael PINTO <michael.pinto@total.com>
Date: 10/28/2009 02:42PM
Subject: Re: East Plant Waste

You would have to check with Bob Wright. Bob has the West Plant files.

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439

▼ Bury.Carolyn@epamail.epa.gov

**Bury.Carolyn@epa
mail.epa.gov**
10/28/2009 02:31 PM

To Michael PINTO <michael.pinto@total.com>

cc

Subject Re: East Plant Waste

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Carolyn
Carolyn Bury
Environmental Scientist

RCRA Corrective Action Program
Land and Chemicals Division
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-----Michael PINTO <michael.pinto@total.com> wrote: -----

To: Carolyn Bury/R5/USEPA/US@EPA
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Date: 10/28/2009 02:26PM
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F022 Wastes, except wastewater and spent carbon from hydrogen chloride purification, from the manufacturing use as a reactant, chemical intermediate, or component in a **formulating process of tetra-, penta-, or hexachlorobenzenes under alkaline conditions**

F023 Wastes, except wastewater and spent carbon from hydrogen chloride purification, from the production of materials on equipment previously used for the production or manufacturing use as a reactant, chemical intermediate, or component in a **formulating process of tri- and tetrachlorophenols** . This listing does not include wastes from equipment used only for the production or use of hexachlorophene from highly purified 2,4,5-trichlorophenol

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EPA-R5-2015-002106-6

Carolyn Bury /R5/USEPA/US

11/24/2009 08:33 AM

To michael.pinto

cc

bcc

Subject Monthly Progress Reports

Hi Mike,

Please send me an electronic version of the monthly progress report via e-mail. Then, the hard copy can be sent via regular mail and not overnight express, which should save money. Also, the paper report can be double-sided if that works at your end.

Is it possible to include more detail on the Halowax system in the reports, such as volume collected and sent to the POTW, and how much NAPL was collected? Alternatively, is this already reported to EPA on a quarterly or yearly basis?

I received your phone message from yesterday and you are out of the office today. Let's talk tomorrow morning - I'm off for the afternoon.

Carolyn

Carolyn Bury
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EPA-R5-2015-002106-7

Carolyn Bury /R5/USEPA/US

01/14/2010 12:07 PM

To Bhooma Sundar

cc

bcc

Subject Fw: East Plant Remedial Action Objectives

Bhooma,

Arkema East has agreed to the CAOs required by MDEQ for industrial land use - 0.99ppb dioxin TEQ and 8.0 ppm benzene, and identified areas where, if the exposure pathway is broken, the CAO will be met for the Site. The attached analysis (I also have a hard copy for you) discusses how capping can meet the CAO. However, I have explained to Mike Pinto that EPA will likely approve the CAO objective and analysis (if it was done properly), but that a capping remedy should not be presumed.

Please review the work done by the HH RA and provide me with your opinion.

Thanks.

Carolyn

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bury.carolyn@epa.gov

----- Forwarded by Carolyn Bury/R5/USEPA/US on 01/14/2010 12:01 PM -----

From: "Kathy Zvarick" <kzvarick@envstd.com>
To: Carolyn Bury/R5/USEPA/US@EPA
Cc: "Michael PINTO" <michael.pinto@total.com>, "Swanson, Peter" <pswanson@croworld.com>
Date: 11/18/2009 01:37 PM
Subject: East Plant Remedial Action Objectives

Carolyn,

Attached please find a letter describing the remedial action objectives for the Legacy Site Services East Plant site in Riverview, Michigan.

Kind regards,

Kathy Zvarick, LEED AP
Manager, Risk Assessment Services
Environmental Standards, Inc.

1140 Valley Forge Road | P.O. Box 810 | Valley Forge, PA 19482
610.935.5577 | Fax: 610.935.5583 | www.envstd.com | kzvarick@envstd.com



Environmental Standards was named to the
2009 Inc. 5000 list of the Fastest Growing
Private Companies in America.





Bury Letter_11_18_2009.pdf

EPA-R5-2015-002106-8

Carolyn Bury /R5/USEPA/US

01/14/2010 02:34 PM

To Michael PINTO

cc

bcc

Subject Re: Bi-monthly Report

Mike,

It is OK to submit the report next week if it will be more inclusive , as described. Also, for future reference, if you send me a .pdf file of the report by the day it is due (e-mail), and send me an original signed copy via regular mail, then you would meet the progress report deadline and save the cost of overnight mail .

Carolyn

Carolyn Bury
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Michael PINTO

Carolyn, If you recall, after the last bi-...

01/14/2010 01:04:41 PM

From: Michael PINTO <michael.pinto@total.com>
To: Carolyn Bury/R5/USEPA/US@EPA
Date: 01/14/2010 01:04 PM
Subject: Bi-monthly Report

Carolyn,

If you recall, after the last bi-monthly report was submitted in November of 2009 you requested that future reports include pumping data and DNAPL removal amounts for the Halowax Area treatment system . I intended to include the total amount of water pumped and DNAPL extracted to date in the report due tomorrow. Future reports will provide data for the two month period. Unfortunately, it doesn't look like CRA will have the data to me in time for me to get this report into the FedEx box by the end of the day . Although I asked them to start tracking this during the November/December reporting period, they have not forwarded me the information yet and I have been unable to contact the site technician or project manager. They are not in the habit of tracking this information so I think its just an oversight . I probably should have reminded them last week. I can either 1) submit the monthly report for delivery to you tomorrow and follow-up with an addendum providing the Halowax data, or 2) submit the report tomorrow or early next week with the Halowax data included . Please let me know your preference. I apologize for the delay. The data will be included in all future reports .

Michael J. Pinto
Legacy Site Services

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EPA-R5-2015-002106-9

Carolyn Bury /R5/USEPA/US

01/19/2010 03:35 PM

To Bhooma Sundar

cc

bcc

Subject Re: Fw: East Plant Remedial Action Objectives

Thanks. Right, there is no presumed capping remedy at this point. Because you have analyzed the data previously, and have completed a similar exercise to determine what areas would be eliminated from the exposure pathway to achieve a 0.99 ppb average concentration, what is your opinion of the work that was done? (Ignore the capping language and consider that the CMS will have an array of alternatives, which will be submitted once the CAO is approved).

CB

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Program
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

-----Bhooma Sundar/R5/USEPA/US wrote: -----

To: Carolyn Bury/R5/USEPA/US@EPA
From: Bhooma Sundar/R5/USEPA/US
Date: 01/19/2010 11:11AM
Subject: Re: Fw: East Plant Remedial Action Objectives

Carolyn,

I recall that the shaded areas in figure 1 were supposed to be excavated and backfilled with clean fill. The site is bounded by the river and a permeable fill as a capping remedy does not sound like a good plan. Jennifer recalls discussing with them on the need for confirmatory samples following excavation. I am not sure why they have proposed capping remedy at this point.

Bhooma Sundar
Toxicologist/Project Manager
RCRA Corrective Action (LU-9J)
Land and Chemicals Division
USEPA Region 5
77, W.Jackson Blvd, Chicago, IL 60604
Tel: 312-886-1660

Carolyn Bury---01/14/2010 12:07:20 PM---Bhooma, Arkema East has agreed to the CAOs required by MDEQ for industrial land use - 0.99ppb dioxin

From: Carolyn Bury/R5/USEPA/US

To: Bhooma Sundar/R5/USEPA/US@EPA
Date: 01/14/2010 12:07 PM
Subject: Fw: East Plant Remedial Action Objectives

Bhooma,

Arkema East has agreed to the CAOs required by MDEQ for industrial land use - 0.99ppb dioxin TEQ and 8.0 ppm benzene, and identified areas where, if the exposure pathway is broken, the CAO will be met for the Site. The attached analysis (I also have a hard copy for you) discusses how capping can meet the CAO. However, I have explained to Mike Pinto that EPA will likely approve the CAO objective and analysis (if it was done properly), but that a capping remedy should not be presumed.

Please review the work done by the HH RA and provide me with your opinion.

Thanks.

Carolyn

Carolyn Bury
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bury.carolyn@epa.gov

----- Forwarded by Carolyn Bury/R5/USEPA/US on 01/14/2010 12:01 PM -----

From: "Kathy Zvarick" <kzvarick@envstd.com>
To: Carolyn Bury/R5/USEPA/US@EPA
Cc: "Michael PINTO" <michael.pinto@total.com>, "Swanson, Peter" <pswanson@croworld.com>
Date: 11/18/2009 01:37 PM
Subject: East Plant Remedial Action Objectives

Carolyn,
Attached please find a letter describing the remedial action objectives for the Legacy Site Services East Plant site in Riverview, Michigan.

Kind regards,
Kathy Zvarick, LEED AP
Manager, Risk Assessment Services
Environmental Standards, Inc.

1140 Valley Forge Road | P.O. Box 810 | Valley Forge, PA 19482
610.935.5577 | Fax: 610.935.5583 | www.envstd.com | kzvarick@envstd.com



Environmental Standards was named to the
2009 Inc. 5000 list of the Fastest Growing
Private Companies in America.



[attachment "Bury Letter_11_18_2009.pdf" deleted by Bhooma Sundar/R5/USEPA/US]

EPA-R5-2015-002106-10

Carolyn Bury /R5/USEPA/US

02/03/2010 10:42 AM

To Bhooma Sundar

cc

bcc

Subject Fw: East Plant Remedial Action Objectives

OK.

-----Forwarded by Carolyn Bury/R5/USEPA/US on 02/03/2010 10:41AM -----

To: Bhooma Sundar/R5/USEPA/US@EPA
From: Carolyn Bury/R5/USEPA/US
Date: 01/14/2010 12:07PM
Subject: Fw: East Plant Remedial Action Objectives

Bhooma,

Arkema East has agreed to the CAOs required by MDEQ for industrial land use - 0.99ppb dioxin TEQ and 8.0 ppm benzene, and identified areas where, if the exposure pathway is broken, the CAO will be met for the Site. The attached analysis (I also have a hard copy for you) discusses how capping can meet the CAO. However, I have explained to Mike Pinto that EPA will likely approve the CAO objective and analysis (if it was done properly), but that a capping remedy should not be presumed.

Please review the work done by the HH RA and provide me with your opinion.

Thanks.

Carolyn

Carolyn Bury
Environmental Scientist
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bury.carolyn@epa.gov

----- Forwarded by Carolyn Bury/R5/USEPA/US on 01/14/2010 12:01 PM -----

From: "Kathy Zvarick" <kzvarick@envstd.com>

To: Carolyn Bury/R5/USEPA/US@EPA

Cc: "Michael PINTO" <michael.pinto@total.com>, "Swanson, Peter" <pswanson@craworld.com>

Date: 11/18/2009 01:37 PM

Subject: East Plant Remedial Action Objectives

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Kind regards,

Kathy Zvarick , LEED AP

Manager, Risk Assessment Services

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(See attached file: Bury Letter_11_18_2009.pdf)



Bury Letter_11_18_2009.pdf

EPA-R5-2015-002106-11

Carolyn Bury /R5/USEPA/US

03/04/2010 10:25 AM

To michael.pinto

cc

bcc

Subject CAOs

1) protection of the Trenton Channel from migration of Site constituents via all migration pathways including discharge of contaminated groundwater , surface water runoff, and airborne deposition

2) protection of human exposure at the Site and from the Site , including future industrial and maintenance workers, trespassers, construction workers, and people using the adjacent golf course

3) Control of sources to groundwater contamination

4) Protection of aquatic organisms and water quality in the Trenton Channel sediments from effects of Site constituents .

Carolyn Bury
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bury.carolyn@epa.gov

EPA-R5-2015-002106-12

Carolyn Bury /R5/USEPA/US

03/26/2010 02:40 PM

To bob.wright

cc

bcc

Subject Approval of request to revise January 2009 PCB Clean-up Plan

Bob -

See approval letter in attached file. Please call me if you have any questions.

Carolyn.



March 18, 2010 PCB Clean-up Revision.PDF

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Program
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

EPA-R5-2015-002106-13

Carolyn Bury /R5/USEPA/US

04/09/2010 02:13 PM

To michael.pinto

cc

bcc

Subject RAO Approval Letter

Please let me know if you have any questions.
Carolyn



April 9 2010 RAO Soil Approval Letter.pdf
Carolyn Bury

Environmental Scientist
RCRA Corrective Action Program
Land and Chemicals Division
U.S. EPA Region Five
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bury.carolyn@epa.gov

EPA-R5-2015-002106-14

Carolyn Bury /R5/USEPA/US

04/14/2010 10:12 AM

To bob.wright

cc

bcc

Subject Scheduling of Arkema West Plant Overview Meeting

Hi Bob,

If memory serves, you were going to contact CRA to find some dates for a meeting to familiarize both of us with the site history and RCRA CA investigation and CMS work completed to date. Please let me know where this stands. I would like to meet in early May, either in Detroit or Chicago. We have the use of the EPA office in Grosse Ile if the meeting is planned for Detroit.

Thanks.

Carolyn

Carolyn Bury
Environmental Scientist
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312-886-3020
bury.carolyn@epa.gov

EPA-R5-2015-002106-15

Carolyn Bury /R5/USEPA/US

04/22/2010 04:05 PM

To Bob WRIGHT

cc

bcc

Subject Re: Scheduling of Arkema West Plant Overview Meeting

Bob,

These are both good dates. I would like our hydro-geo and HH staff to join the meeting so please let me get back to you with the better date.

Thanks.

Carolyn

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Program
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

Bob WRIGHT

Trying to work through dates with our c...

04/20/2010 08:57:49 AM

From: Bob WRIGHT <bob.wright@arkema.com>
To: Carolyn Bury/R5/USEPA/US@EPA
Date: 04/20/2010 08:57 AM
Subject: Re: Scheduling of Arkema West Plant Overview Meeting

Trying to work through dates with our consultant, CRA. I would like to have the previous project manager who was involved in the RI reports and sampling attend. However he currently works/lives in Vancouver, British Columbia and has a tight schedule.

Based on current conflicts and schedules, the earliest dates available are Tues May 18 or Wed May 19. Would either of these work? Per previous discussion I am assuming that we would be meeting at Region V offices, but we can meet in Detroit if you would wish to see the site.

Bury.Carolyn@epamail.epa.gov

04/14/2010 11:12 AM

To bob.wright@arkema.com

cc

Subject Scheduling of Arkema West Plant Overview Meeting

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Thanks.

Carolyn

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RCRA Corrective Action Program
Land and Chemicals Division
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77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

EPA-R5-2015-002106-16

Carolyn Bury /R5/USEPA/US

04/23/2010 04:41 PM

To Bob WRIGHT

cc Bhooma Sundar, GARY CYGAN

bcc

Subject Re: Scheduling of Arkema West Plant Overview Meeting

Bob -

Based on EPA availability, let's meet May 18, 2010 in Chicago.

Let's touch base next week.

Carolyn

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Program
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

Bob WRIGHT

Trying to work through dates with our c...

04/20/2010 08:57:49 AM

From: Bob WRIGHT <bob.wright@arkema.com>
To: Carolyn Bury/R5/USEPA/US@EPA
Date: 04/20/2010 08:57 AM
Subject: Re: Scheduling of Arkema West Plant Overview Meeting

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Bury.Carolyn@epamail.epa.gov

04/14/2010 11:12 AM

To bob.wright@arkema.com

cc

Subject Scheduling of Arkema West Plant Overview Meeting

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Thanks.

Carolyn

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bury.carolyn@epa.gov

EPA-R5-2015-002106-17

Carolyn Bury /R5/USEPA/US

05/04/2010 01:35 PM

To Michael PINTO

cc

bcc

Subject Re: CMS

Hi Mike,
EPA only needs two copies. Are you able to send a .pdf version as well?
Thanks for asking.
Carolyn

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Program
Land and Chemicals Division
U.S. EPA Region Five
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312-886-3020
bury.carolyn@epa.gov

Michael PINTO

Carolyn, We are on schedule for to hav...

05/04/2010 01:28:13 PM

From: Michael PINTO <michael.pinto@total.com>
To: Carolyn Bury/R5/USEPA/US@EPA
Date: 05/04/2010 01:28 PM
Subject: CMS

Carolyn,

We are on schedule for to have the CMS in FedEx on Thursday for delivery to your office on May 7.
How many copies will you need? In the past we have submitted 3 copies to EPA, 1 copy to Peter Quakenbush, and 1 copy to Larry Aubuchon, both at DEQ.

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439

EPA-R5-2015-002106-18

Carolyn Bury /R5/USEPA/US

05/04/2010 01:54 PM

To Michael PINTO

cc

bcc

Subject RE: CMS

Mike,

Why don't you hold off on the .pdf in that case, except for the text portion. If I still need the CMS in its entirety electronically, I'll let you know.

Carolyn

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Program
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

Michael PINTO

We should be able to send a pdf, altho...

05/04/2010 01:41:34 PM

From: Michael PINTO <michael.pinto@total.com>
To: Carolyn Bury/R5/USEPA/US@EPA
Date: 05/04/2010 01:41 PM
Subject: RE: CMS

We should be able to send a pdf, although it will come in a series of 4 or 5 emails due to the file size.

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439

-----Original Message-----

From: Bury.Carolyn@epamail.epa.gov [mailto:Bury.Carolyn@epamail.epa.gov]
Sent: Tuesday, May 04, 2010 2:35 PM
To: Michael PINTO
Subject: Re: CMS

Hi Mike,

EPA only needs two copies. Are you able to send a .pdf version as well?

Thanks for asking.

Carolyn

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Program
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J

Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

From: Michael PINTO <michael.pinto@total.com>
To: Carolyn Bury/R5/USEPA/US@EPA
Date: 05/04/2010 01:28 PM
Subject: CMS

Carolyn,

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Phone: (610) 594-4435
Fax: (610) 594-4439

EPA-R5-2015-002106-19

Carolyn Bury /R5/USEPA/US

05/13/2010 02:27 PM

To Bob WRIGHT

cc JeanMarie CENCETTI, "Swanson, Peter", Bhooma Sundar,
GARY CYGAN

bcc

Subject Re: Arkema Riverview Michigan Discussion - May 18

Thanks Bob.
Carolyn

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Program
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

Bob WRIGHT

Attached is a simple agenda for the me...

05/13/2010 02:22:34 PM

From: Bob WRIGHT <bob.wright@arkema.com>
To: Carolyn Bury/R5/USEPA/US@EPA
Cc: "Swanson, Peter" <pswanson@croworld.com>, JeanMarie CENCETTI
<jeanmarie.cencetti@arkema.com>
Date: 05/13/2010 02:22 PM
Subject: Arkema Riverview Michigan Discussion - May 18

Attached is a simple agenda for the meeting next Tuesday regarding the RCRA Corrective Action at the Arkema Riverview property. We will try to incorporate as much as possible, the items we talked about today into the meeting discussions.

We will plan on arriving at your offices at 9:00 on Tuesday and will go to the 8th floor to sign in and call you. See you next week.



EPA meeting agenda for 5 18 2010.doc

EPA-R5-2015-002106-20

Carolyn Bury /R5/USEPA/US

05/21/2010 02:13 PM

To bob.wright

cc

bcc

Subject Site-Wide PCB Clean-up Plan dated May 2010 - question

Bob,

I will be sending you some questions and comments about your sampling approach as I am reviewing the plan.

Compositing Samples

The plan proposes compositing samples per 40 CFR 761.289. However, that section addresses compositing specifically for post-clean-up confirmatory samples, not for investigation/characterization. I could not find anything in the TSCA regs that allows compositing during characterization. This morning we discussed how your plan is an approach of combining confirmatory and characterization sampling steps, but the conversation did not include compositing. Compositing during characterization could cause a migration pathway to be missed. Furthermore, as vertical as well as horizontal characterization is being accomplished, *generally* allowing compositing is not supportable.

With more information on the sampling plan, compositing could be allowed selectively. This is one area of the plan where I will require additional detail.

Thanks.

Carolyn

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312-886-3020
bury.carolyn@epa.gov

EPA-R5-2015-002106-21

Carolyn Bury /R5/USEPA/US

05/21/2010 03:53 PM

To bob.wright

cc Peter Ramanauskas

bcc

Subject Mich Part 201 PCB numbers

Bob,

In footnote T of the Part 201 Soil numbers, the State defers to TSCA Subpart D and G (adopted by reference).

Footnote T also states that "if TSCA standards are not applicable" to use Part 201 soil direct contact number of 16 ppm for Industrial/Commercial II. I'm not sure how applicability is determined in this context. I'll discuss internally but if you or CRA can shed light on this topic that would be grand.

Carolyn

Carolyn Bury
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bury.carolyn@epa.gov

EPA-R5-2015-002106-22

Carolyn Bury /R5/USEPA/US

05/27/2010 03:01 PM

To Bob WRIGHT

cc

bcc

Subject Re: Arkema West Plant - Site-Wide PCB Sampling

Hi Bob,
Did you mean to attach the table?
Carolyn

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Program
Land and Chemicals Division
U.S. EPA Region Five
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Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

Bob WRIGHT

As requested, Arkema a drafted inform...

05/27/2010 02:04:10 PM

From: Bob WRIGHT <bob.wright@arkema.com>
To: Carolyn Bury/R5/USEPA/US@EPA
Date: 05/27/2010 02:04 PM
Subject: Arkema West Plant - Site-Wide PCB Sampling

As requested, Arkema a drafted information providing a clarification and details on proposed PCB characterization sampling at the Arkema West Plant property in Riverview, Michigan. The following is draft text that will be revised as necessary and finalized into a submittal letter. Before finalizing the summary we would appreciate confirmation that the information is detailed enough to address your questions.

The draft text is as follows:

"Per your request, Arkema Inc. (Arkema) is providing further clarification and details regarding proposed PCB characterization sampling at the West Plant property in Riverview, Michigan. The sampling is based on results and conclusions from the previous characterization sampling. In general, these results showed that PCB impacted areas were primarily limited to shallow soils in secondary containment areas (former aboveground tank containment dike areas). PCB impacts have been identified in fifteen dike areas at the property. Delineation and design sampling has been completed during previous phases of work in four of these dike areas (D-3, D-4, D-5 and D-33). Approved interim measures have been completed at one area (D-50). Delineation sampling is proposed at the remaining ten areas (D-2, D-6, D-7, D-8, D-10, D-11, D-30, D-34, D-38, and D-42). Additional verification sampling will be completed in the remediation areas.

The proposed sampling is summarized in the attached table. As noted the listed number of samples is estimated and sample locations and number will be determined in the field. The proposed sampling will include:

- Vertical delineation – Discrete samples will be collected at depth within secondary containment areas. The samples will be collected to provide vertical delineation and help to define excavation limits (to be confirmed by verification composite samples). The approximate number of proposed samples is listed in

the attached table. In general, four samples will be collected in each dike area.

Previous results indicated that in most areas, impacts are limited to shallow soils (i.e. top one foot of soil), therefore in most areas the initial verification samples will be collected at 1-1.5 feet of soil depth. Note that due to the gravel layer present throughout the site, soils are found at 4-6 inches below surface. Therefore this sample interval would be approximately 1.5-2 feet below surface.

In select areas, the previously collected deeper sample intervals did show impacts. In these areas samples will be collected at the previous sample depth to confirm previous results and at a depth interval below these sample to provide vertical delineation.

- Perimeter sampling – To confirm that the impacts are limited to soils within the secondary containment areas, discrete soil samples will be collected from the uppermost soil layer around the outside perimeter of the secondary containment areas at an interval of approximately one sample every 20 feet. The areas and estimated number of samples is summarized in Table 1.
- Confirmation/delineation samples – At a few locations (samples SB-8, SB-16, SB-17, SB-20) previous sampling indicated impacts outside the perimeter of the former secondary containment areas. Confirmation samples will be collected at these locations to verify previous results. Samples will also be collected approximately 20 feet beyond these samples for further delineation. Specific sample locations will be selected in the field.

The results of the above sampling may indicate that additional delineation sampling is necessary. Subsequent sampling may be performed to provide adequate information for delineation and design.

In addition to the characterization sampling described above, additional samples may be collected including:

- Waste Classification Sampling – Samples will be collected for waste classification purposes to be used for landfill selection and approval. The specific analysis and sample rate will be determined by landfill acceptance requirements (e.g. one TCLP composite per 400 tons of waste).
- In areas where delineation is complete, verification samples (design samples) will be collected to confirm limits of excavation (i.e. allowing excavation to known limits of excavation). This sampling would be performed on a 10-foot sampling grid as described in Section 4.4.1.1 of the “Site-Wide PCB Cleanup Plan” (CRA, May 2010).

The sampling will be conducted following previously approved procedures. It is anticipated that the characterization sampling described above will take approximately 7 weeks to complete. This would include sampling, plus receipt and review of initial laboratory data. As noted above, additional sampling may be required based on the results of the sampling. The schedule could be extended if additional rounds of sampling are required to complete the characterization work.

The results of all the sampling will be provided to EPA at the completion of the characterization sampling program. The results of the study, plus clarification and modifications, if any, to the Site-wide PCB Cleanup Plan will be submitted to the Agency."

EPA-R5-2015-002106-23

Carolyn Bury /R5/USEPA/US

05/27/2010 03:40 PM

To Bob WRIGHT

cc

bcc

Subject Re: Arkema West Plant - Site-Wide PCB Sampling

Bob,

Please see inserted text below. See earlier E-mail where I ask whether you meant to include the table -- I think that you may have left for the day. The table would be what I'd need to review the approach.

Carolyn

Carolyn Bury
Environmental Scientist
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Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
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Bob WRIGHT

As requested, Arkema a drafted inform...

05/27/2010 02:04:10 PM

From: Bob WRIGHT <bob.wright@arkema.com>
To: Carolyn Bury/R5/USEPA/US@EPA
Date: 05/27/2010 02:04 PM
Subject: Arkema West Plant - Site-Wide PCB Sampling

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The proposed sampling is summarized in the attached table. As noted the listed number of samples is estimated and sample locations and number will be determined in the field. The proposed sampling will include:

- Vertical delineation – Discrete samples will be collected at depth within secondary containment areas. I assume that the meaning of "at depth" will be clear from the table. The samples will be collected to

provide vertical delineation and help to define excavation limits (to be confirmed by verification composite samples). The approximate number of proposed samples is listed in the attached table. In general, four samples will be collected in each dike area.

Previous results indicated that in most areas, impacts are limited to shallow soils (i.e. top one foot of soil), therefore in most areas the initial verification samples will be collected at 1-1.5 feet of soil depth. Note that due to the gravel layer present throughout the site, soils are found at 4-6 inches below surface. Therefore this sample interval would be approximately 1.5-2 feet below surface.

In select areas, the previously collected deeper sample intervals did show impacts. In these areas samples will be collected at the previous sample depth to confirm previous results and at a depth interval below these sample to provide vertical delineation.

- Perimeter sampling – To confirm that the impacts are limited to soils within the secondary containment areas, discrete soil samples will be collected from the uppermost soil layer around the outside perimeter of the secondary containment areas at an interval of approximately one sample every 20 feet. The areas and estimated number of samples is summarized in Table 1.
- Confirmation/delineation samples – At a few locations (samples SB-8, SB-16, SB-17, SB-20) previous sampling indicated impacts outside the perimeter of the former secondary containment areas. Confirmation samples will be collected at these locations to verify previous results. Samples will also be collected approximately 20 feet beyond these samples for further delineation. Specific sample locations will be selected in the field. **The migration direction will not necessarily be obvious so do you intend to do a grid approach for the "step-out?"**

The results of the above sampling may indicate that additional delineation sampling is necessary. Subsequent sampling may be performed to provide adequate information for delineation and design.

In addition to the characterization sampling described above, additional samples may be collected including:

- Waste Classification Sampling – Samples will be collected for waste classification purposes to be used for landfill selection and approval. The specific analysis and sample rate will be determined by landfill acceptance requirements (e.g. one TCLP composite per 400 tons of waste).
- In areas where delineation is complete, verification samples (design samples) will be collected to confirm limits of excavation (i.e. allowing excavation to known limits of excavation). This sampling would be performed on a 10-foot sampling grid as described in Section 4.4.1.1 of the “Site-Wide PCB Cleanup Plan” (CRA, May 2010).

The sampling will be conducted following previously approved procedures. It is anticipated that the characterization sampling described above will take approximately 7 weeks to complete. This would include sampling, plus receipt and review of initial laboratory data. As noted above, additional sampling may be required based on the results of the sampling. The schedule could be extended if additional rounds of sampling are required to complete the characterization work.

The results of all the sampling will be provided to EPA at the completion of the characterization sampling program. The results of the study, plus clarification and modifications, if any, to the Site-wide PCB Cleanup Plan will be submitted to the Agency."

EPA-R5-2015-002106-24

Carolyn Bury /R5/USEPA/US

07/01/2010 10:39 AM

To Bob WRIGHT

cc

bcc

Subject Re: Arkema Riverview West Plant Property

Bob,

Thanks for the notification. I'm back from vacation and available if you need to contact me.

Carolyn

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Program
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

Bob WRIGHT

Arkema Inc. has received the approval...

06/10/2010 09:25:10 AM

From: Bob WRIGHT <bob.wright@arkema.com>
To: Carolyn Bury/R5/USEPA/US@EPA
Cc: JeanMarie CENCETTI <jeanmarie.cencetti@arkema.com>
Date: 06/10/2010 09:25 AM
Subject: Arkema Riverview West Plant Property

Arkema Inc. has received the approval for the Site-wide PCB Cleanup Plan for the West Plant property. In accordance with approval letter, we are providing notice of fieldwork and sampling activities. The PCB characterization sampling, is scheduled to begin the week of June 28, 2010. This work will be completed in accordance with the approval plan and as further described in the June 1, 2010 letter from Arkema.

Please call if you have questions or if you wish to discuss.

EPA-R5-2015-002106-25

Carolyn Bury /R5/USEPA/US

07/01/2010 03:52 PM

To Bob WRIGHT

cc

bcc

Subject Re: Arkema Riverview West Plant Property

Thanks, it was a nice vacation, preferred Ireland.

Fast work on the sampling, looking forward to getting the data.

I'll call you soon to discuss the additional groundwater sampling per the EI recommendation .

Carolyn

Carolyn Bury
Environmental Scientist
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U.S. EPA Region Five
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Chicago, IL 60604
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bury.carolyn@epa.gov

Bob WRIGHT

Welcome back CRA should be finishin...

07/01/2010 12:12:05 PM

From: Bob WRIGHT <bob.wright@arkema.com>
To: Carolyn Bury/R5/USEPA/US@EPA
Date: 07/01/2010 12:12 PM
Subject: Re: Arkema Riverview West Plant Property

Welcome back

CRA should be finishing the PCB sampling today (possibly tomorrow). We will begin to get lab results in a couple of weeks. I will keep you informed regarding status and results .

Hope you had a good trip

EPA-R5-2015-002106-26

Carolyn Bury /R5/USEPA/US

07/15/2010 11:32 AM

To Bob WRIGHT

cc

bcc

Subject Re: Arkema Riverview West Plant Property

Thanks. I have a letter drafted to you but have two fire drills at other site. Call you later today or tomorrow.

CB

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Program
Land and Chemicals Division
U.S. EPA Region Five
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Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

Bob WRIGHT

I assume you are still catching up, but...

07/15/2010 09:56:17 AM

From: Bob WRIGHT <bob.wright@arkema.com>
To: Carolyn Bury/R5/USEPA/US@EPA
Date: 07/15/2010 09:56 AM
Subject: Re: Arkema Riverview West Plant Property

I assume you are still catching up, but give me a call when you wish to discuss the well sampling.

Note that PCB data is still outstanding. I will let you know when we have some conclusions on results.

Bury.Carolyn@epamail.epa.gov

07/01/2010 04:52 PM

To Bob WRIGHT <bob.wright@arkema.com>

cc

Subject Re: Arkema Riverview West Plant Property

Thanks, it was a nice vacation, preferred Ireland.

Fast work on the sampling, looking forward to getting the data.

I'll call you soon to discuss the additional groundwater sampling per the EI recommendation.

Carolyn

Carolyn Bury
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bury.carolyn@epa.gov

From: Bob WRIGHT <bob.wright@arkema.com>
To: Carolyn Bury/R5/USEPA/US@EPA
Date: 07/01/2010 12:12 PM
Subject: Re: Arkema Riverview West Plant Property

Welcome back

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Hope you had a good trip

EPA-R5-2015-002106-27

Carolyn Bury /R5/USEPA/US

07/21/2010 12:12 PM

To Michael PINTO

cc GARY CYGAN

bcc

Subject Arkema, Inc. East Plant, CMS Topic, Monitoring of Area 17
IRM

Hi Mike,

Additional monitoring is needed to establish that the IRM for Area 17 is effective in terms of deterring migration of a plume to the Detroit River. Per the CMS, MW-025 was installed to ensure that migration of contaminated groundwater did not bypass the sheet pile wall and enter the Trenton Channel. However, MW-025 appears to have only been sampled twice, during consecutive months: August 2006 and September 2006. These two events do not supply sufficient data to support a decision regarding remedy effectiveness.

Please prepare to begin quarterly monitoring of the well; after an established time period of non-detects, this frequency could be reduced. Let's discuss the analyte list tomorrow or early next week. Additionally, I will be requesting that our hydrogeologist review the well boring information to determine whether the screening depth is appropriate and whether any wells need to be added in the area to monitor plume migration.

Additional information may be required regarding the physical characteristics and integrity of the sheet pile wall, and/or how the wall is monitored for its barrier capabilities.

Thanks.

Carolyn Bury
Environmental Scientist
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EPA-R5-2015-002106-28

Carolyn Bury /R5/USEPA/US

07/21/2010 02:41 PM

To Michael PINTO

cc

bcc

Subject CMS Topic: MW Map

Mike,

Can you refer me to a figure that would include all the Site monitoring wells , including the RFI and the IRM wells? Additionally, should I assume that the RFI report, the IRM report, and the EI 750 documentation would be the only places where I would find groundwater data? If not, please refer me to additional documents.

Thanks.

Carolyn

Carolyn Bury

Environmental Scientist

RCRA Corrective Action Program

Land and Chemicals Division

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EPA-R5-2015-002106-29

Michael PINTO
<michael.pinto@total.com>
07/26/2010 08:09 AM

To Carolyn Bury
cc "Swanson, Peter"
bcc
Subject RE: Arkema, Inc. East Plant, CMS Topic, Monitoring of Area 17 IRM

I just returned from vacation. I will make arrangements with CRA to begin quarterly sampling of the well as soon as possible. We will send you a very brief letter-format work plan specifying sampling and laboratory methods.

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439

From: Bury.Carolyn@epamail.epa.gov [mailto:Bury.Carolyn@epamail.epa.gov]
Sent: Wednesday, July 21, 2010 1:12 PM
To: Michael PINTO
Cc: Cygan.Gary@epamail.epa.gov
Subject: Arkema, Inc. East Plant, CMS Topic, Monitoring of Area 17 IRM

Hi Mike,

Additional monitoring is needed to establish that the IRM for Area 17 is effective in terms of deterring migration of a plume to the Detroit River. Per the CMS, MW-025 was installed to ensure that migration of contaminated groundwater did not bypass the sheet pile wall and enter the Trenton Channel. However, MW-025 appears to have only been sampled twice, during consecutive months: August 2006 and September 2006. These two events do not supply sufficient data to support a decision regarding remedy effectiveness.

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Additional information may be required regarding the physical characteristics and integrity of the sheet pile wall, and/or how the wall is monitored for its barrier capabilities.

Thanks.
Carolyn Bury
Environmental Scientist
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EPA-R5-2015-002106-30

Carolyn Bury /R5/USEPA/US

07/26/2010 01:46 PM

To Bob WRIGHT

cc JeanMarie CENCETTI

bcc

Subject Re: Arkema Riverview West Plant Property - PCB Samples

Thanks Bob.

I received your voice mail this morning , sounds good but I'd like to look at a figure and talk. Those files are at the office -working from home today.

Call you tomorrow?

Carolyn

Carolyn Bury

Environmental Scientist

RCRA Corrective Action Program

Land and Chemicals Division

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312-886-3020

bury.carolyn@epa.gov

-----Bob WRIGHT <bob.wright@arkema.com> wrote: -----

To: Carolyn Bury/R5/USEPA/US@EPA

From: Bob WRIGHT <bob.wright@arkema.com>

Date: 07/26/2010 01:11PM

cc: JeanMarie CENCETTI <jeanmarie.cencetti@arkema.com>

Subject: Re: Arkema Riverview West Plant Property - PCB Samples

As indicated in my voice mail , we received the preliminary results from the PCB soil sampling completed in late June/early July at the Riverview West Plant property . Of the roughly 105 samples, four (4) had concentrations above 25 ppm (three in the D-8 secondary containment area and one in the perimeter of secondary containment area D-30).

Based on the results, we plan on collecting additional delineation samples (deeper in area D-8, and step out from D-30 location) and have scheduled the work for later this week.

Please give me a call if you wish to discuss .

EPA-R5-2015-002106-31

Michael PINTO
<michael.pinto@total.com>
07/26/2010 04:00 PM

To Carolyn Bury
cc
bcc
Subject CMS Topic: MW Map

Carolyn,

The figures that are closest to what you are requesting are figure 1 from the Revised EI dated June 7, 2005 (drawing number "**14027-11(MOOR007)GN-DE001**" - attached), and the CMS report figure 2.8 (drawing number "**14027-14(015)GN-DE003 (Figure 2.8)**" - attached), which includes close-up details of Area 17. There is not an single "well map" figure for the East Plant that is current and doesn't include things like databoxes.

As far as groundwater data, your assumption is generally correct, with the exception of some additional data for MW-025 included in the CMS. The revised EI dated June 7, 2005 includes all data we have in our database from 1993 through 2004 and the CMS includes additional data from MW-025. Regular ground water monitoring at the site was never initiated since it was never anticipated that so much time would pass between the investigation and remedy phase. Perhaps we should discuss the value of a contemporary round of groundwater sampling prior completing your review of the CMS and what effect that might have on our schedule. What time do you want to talk tomorrow?

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439

From: Bury.Carolyn@epamail.epa.gov [mailto:Bury.Carolyn@epamail.epa.gov]
Sent: Wednesday, July 21, 2010 3:41 PM
To: Michael PINTO
Subject: CMS Topic: MW Map

Mike,

Can you refer me to a figure that would include all the Site monitoring wells, including the RFI and the IRM wells? Additionally, should I assume that the RFI report, the IRM report, and the EI 750 documentation would be the only places where I would find groundwater data? If not, please refer me to additional documents.

Thanks.
Carolyn
Carolyn Bury
Environmental Scientist
RCRA Corrective Action Program
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bury.carolyn@epa.gov 14027-11(MOOR007)GN-DE001.pdf 14027-14(015)GN-DE003 (Figure 2.8).pdf

EPA-R5-2015-002106-32

Carolyn Bury /R5/USEPA/US

07/27/2010 09:45 AM

To michael.pinto, bob.wright

cc

bcc

Subject Financial Assurance at Arkema?

Please let me know what the financial assurance mechanism is at the Arkema site(s). We may have discussed this over the past year but I cannot recall the details.

Thanks.

Carolyn

Carolyn Bury
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EPA-R5-2015-002106-33

Michael PINTO
<michael.pinto@total.com>

07/27/2010 03:45 PM

To Carolyn Bury

cc

bcc

Subject MW-25

Carolyn,

I was mistaken when I told you that MW-25 was installed as part of the EI. MW-25 is first mentioned in the CMS work plan which states that it will be installed to assist in evaluating the effectiveness of the Halowax containment system. A stratigraphic log of MW-25 is included in the CMS as Appendix B. The RFI does include cross sections of the site, however MW-25 was installed after the RFI was completed and therefore MW-25 is not included on the cross sections.

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Phone: (610) 594-4435
Fax: (610) 594-4439

EPA-R5-2015-002106-34

Carolyn Bury /R5/USEPA/US

08/06/2010 02:14 PM

To michael.pinto

cc

bcc

Subject CMS Report Topics

Hi Mike,

Three items for now:

- 1) Regarding groundwater corrective measure Alternative No 1, please provide an estimate of number of years that the Area 17 IRM would be operating.
- 2) Area 17 IRM - In addition to collecting data from MW-025 (per earlier email and discussion) IRM-MW-1, IRM-MW-2 and IRM-MW-03 should be sampled to monitor the effectiveness of the system. Wells 2 and 3 are on the river side of the sheet pile wall and collection system, correct? We would likely require routine monitoring of all three wells as long as the system is operating.
- 3) You mentioned that MW-17 was near the "chloroform plant." I couldn't find a SWMU so named, so one of the buildings must be what you were referring to (?). What number building was that?

Thanks.

Carolyn

Carolyn Bury
Environmental Scientist
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EPA-R5-2015-002106-35

Michael PINTO
<michael.pinto@total.com>
08/06/2010 03:50 PM

To Carolyn Bury
cc "Swanson, Peter"
bcc
Subject RE: CMS Report Topics

Carolyn,

Pete Swanson from CRA is on vacation, but I'll try to answer your questions in his absence. I can verify these answers when Pete returns next week.

- 1) This is difficult to determine but based on the fact that we are recovering DNAPL I think we can assume that the Halowax Area groundwater collection and treatment system will operate for the CERCLA default period of 30 years.
- 2) IRM monitoring wells 1, 2, and 3 are not on the river side of the sheet pile wall. The river runs right along the wall as shown in the attached pictures. As I think the pictures demonstrate, it's not really possible to monitor groundwater outside of the wall, only surface water. Pore water monitoring, if it could be done below the substantial rip rap place, at the toe of the wall (under water), would not really provide any meaningful data regarding the effectiveness of the wall, since we already know that site related compounds are present in the river sediments along the Halowax area. The wall constructed with a water tight joint sealant (Adeka) designed to provide a containment system with a hydraulic conductivity of 10^{-10} cm/sec. Please let me know if I misunderstood your question.
- 3) The chloroform plant was formerly in Building 12.

I'm in all next week if you want to give me a call to discuss any questions.

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439

From: Bury.Carolyn@epamail.epa.gov [mailto:Bury.Carolyn@epamail.epa.gov]
Sent: Friday, August 06, 2010 3:14 PM
To: Michael PINTO
Subject: CMS Report Topics

Hi Mike,

Three items for now:

1) Regarding groundwater corrective measure Alternative No 1, please provide an estimate of number of years that the Area 17 IRM would be operating.

2) Area 17 IRM - In addition to collecting data from MW-025 (per earlier email and discussion) IRM-MW-1, IRM-MW-2 and IRM-MW-03 should be sampled to monitor the effectiveness of the system. Wells 2 and 3 are on the river side of the sheet pile wall and collection system, correct? We would likely require routine monitoring of all three wells as long as the system is operating.

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Thanks.

Carolyn

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bury.carolyn@epa.gov 20100806163251505.pdf

EPA-R5-2015-002106-36

Carolyn Bury /R5/USEPA/US

08/06/2010 03:55 PM

To Michael PINTO

cc

bcc

Subject RE: CMS Report Topics

Thanks Mike, the picture is quite useful. I will revise my question to discuss the gradient near the collection system and MWs 2 and 3, but let's do that on the phone next week. Enjoy the weekend.

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Program
Land and Chemicals Division
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Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

Michael PINTO

Carolyn, Pete Swanson from CRA is o...

08/06/2010 03:51:19 PM

From: Michael PINTO <michael.pinto@total.com>
To: Carolyn Bury/R5/USEPA/US@EPA
Cc: "Swanson, Peter" <pswanson@croworld.com>
Date: 08/06/2010 03:51 PM
Subject: RE: CMS Report Topics

Carolyn,

Pete Swanson from CRA is on vacation, but I'll try to answer your questions in his absence. I can verify these answers when Pete returns next week.

- 1) This is difficult to determine but based on the fact that we are recovering DNAPL I think we can assume that the Halowax Area groundwater collection and treatment system will operate for the CERCLA default period of 30 years.
- 2) IRM monitoring wells 1, 2, and 3 are not on the river side of the sheet pile wall. The river runs right along the wall as shown in the attached pictures. As I think the pictures demonstrate, it's not really possible to monitor groundwater outside of the wall, only surface water. Pore water monitoring, if it could be done below the substantial rip rap place, at the toe of the wall (under water), would not really provide any meaningful data regarding the effectiveness of the wall, since we already know that site related compounds are present in the river sediments along the Halowax area. The wall constructed with a water tight joint sealant (Adeka) designed to provide a containment system with a hydraulic conductivity of 10^{-10} cm/sec. Please let me know if I misunderstood your question.
- 3) The chloroform plant was formerly in Building 12.

I'm in all next week if you want to give me a call to discuss any questions.

Michael J. Pinto
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From: Bury.Carolyn@epamail.epa.gov [mailto:Bury.Carolyn@epamail.epa.gov]
Sent: Friday, August 06, 2010 3:14 PM
To: Michael PINTO
Subject: CMS Report Topics

Hi Mike,

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Thanks.

Carolyn

Carolyn Bury
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RCRA Corrective Action Program
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bury.carolyn@epa.gov[attachment "20100806163251505.pdf" deleted by Carolyn Bury/R5/USEPA/US]

EPA-R5-2015-002106-37

Carolyn Bury /R5/USEPA/US

08/10/2010 05:26 PM

To bob.wright

cc

bcc

Subject draft letter

Bob,

Please let me know if I have identified the "GSI" wells correctly, that is, with the current well ID#s.
Thanks.



August 12, 2010 Request for M/W Data.doc

Carolyn Bury
Environmental Scientist
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bury.carolyn@epa.gov

EPA-R5-2015-002106-38

Carolyn Bury /R5/USEPA/US

08/12/2010 03:49 PM

To michael.pinto

cc

bcc

Subject May 2010 CMS Report, Information Requested

Hi Mike,

Please see the attached letter requesting information on the CMS topics we've been discussing. Let me know if you have any questions.

Carolyn



August 12, 2010 CMS Partial Review w Requests.PDF

Carolyn Bury
Environmental Scientist
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bury.carolyn@epa.gov

EPA-R5-2015-002106-39

Carolyn Bury /R5/USEPA/US

08/12/2010 05:19 PM

To bob.wright

cc

bcc

Subject CMS - Request for MW Data

Hi Bob,

Please see attached letter requesting the MW data which we have discussed . I'll be in the office Fri but leaving early afternoon if you need clarification or have questions .

Carolyn



Aug 12, 2010 Req for MW Data - CMS.PDF

Carolyn Bury
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EPA-R5-2015-002106-40

Carolyn Bury /R5/USEPA/US

09/09/2010 05:53 PM

To michael.pinto

cc

bcc

Subject DNAPL Info for CMS

Hi Mike,

I wasn't sure if you were expecting an approval from me regarding your approach for preparing the DNAPL information I had requested to support my evaluation of the CMS. You outlined an acceptable approach in a phone message to me about three weeks ago. It sounded as if you and your consultants had come up with a way to prepare a figure showing the approximate DNAPL extent, and to make an estimate of how long the recovery system would be operating under the alternatives in the CMS, given the site-specific circumstances. I ran your approach by our resident DNAPL expert who agreed with the steps you are taking. I'll give you a call tomorrow to see where this work stands and when you think it will be completed.

Thanks.

Carolyn

Carolyn Bury
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bury.carolyn@epa.gov

EPA-R5-2015-002106-41

Michael PINTO
<michael.pinto@total.com>
09/10/2010 07:50 AM

To Carolyn Bury
cc
bcc
Subject RE: DNAPL Info for CMS

I wasn't waiting for approval. CRA has been working on responding to the requests in your last letter using the data we have available. I'm in all day today. Give me a call and I can described what we expect to send you.

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439

From: Bury.Carolyn@epamail.epa.gov [mailto:Bury.Carolyn@epamail.epa.gov]
Sent: Thursday, September 09, 2010 6:53 PM
To: Michael PINTO
Subject: DNAPL Info for CMS

Hi Mike,

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Thanks.

Carolyn

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bury.carolyn@epa.gov

EPA-R5-2015-002106-42

Carolyn Bury /R5/USEPA/US

09/10/2010 04:57 PM

To bob.wright

cc

bcc

Subject Arkema West - August 23, 2010 Site-Wide PCB
Characterization Sampling

Bob,

Following our discussion today, I consulted with my Branch Chief, Jose Cisneros, regarding whether any EPA approval was required for the subject document. He indicated that his prior approval, dated June 4, 2010, of your May 2010 revised plan is inclusive of (applies to) the subject document. Please continue to provide EPA with notification of each major phase of the project and with relevant documents, per the June 4, 2010 letter.

Thank you.

Carolyn

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Program
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

EPA-R5-2015-002106-43

Michael PINTO
<michael.pinto@total.com>

09/13/2010 01:35 PM

To Carolyn Bury

cc

bcc

Subject Arkema East Plant

Good news, the results of the sampling you requested show that concentrations in the Halowax sentinel well, MW-25, are below the most conservative Michigan 201 standards.

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439

EPA-R5-2015-002106-44

Michael PINTO
<michael.pinto@total.com>
09/13/2010 03:23 PM

To Carolyn Bury
cc
bcc
Subject RE: Arkema East Plant

Here's a draft table of the results that we intend to include with the response to your August 12 letter.

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439

From: Bury.Carolyn@epamail.epa.gov [mailto:Bury.Carolyn@epamail.epa.gov]
Sent: Monday, September 13, 2010 3:52 PM
To: Michael PINTO
Subject: Re: Arkema East Plant

Thanks. Was there a detect? What about the other wells?

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Program
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

-----Michael PINTO <michael.pinto@total.com> wrote: -----

To: Carolyn Bury/R5/USEPA/US@EPA
From: Michael PINTO <michael.pinto@total.com>
Date: 09/13/2010 01:35PM
Subject: Arkema East Plant

Good news, the results of the sampling you requested show that concentrations in the Halowax sentinel well, MW-25, are below the most conservative Michigan 201 standards.

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439



014027Pinto-38D-AttC.XLS

EPA-R5-2015-002106-45

Michael PINTO
<michael.pinto@total.com>
09/16/2010 01:25 PM

To Carolyn Bury
cc kingta, "Bollinger, Mike (Pittsburgh) NA"
bcc
Subject Response to August 12 letter

As we discussed by phone today, LSS' response to USEPA's letter of August 12, 2010 requesting additional information regarding the Arkema East Plant CMS will be submitted on September 23.

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439

EPA-R5-2015-002106-46

Michael PINTO
<michael.pinto@total.com>

09/17/2010 04:32 PM

To "Bury.Carolyn@epamail.epa.gov"

cc

bcc

Subject East Plant Progress Report

Attached, please find the July/August 2010 progress report for the Arkema East Plant.

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439



progress report 123.pdf

EPA-R5-2015-002106-47

Michael PINTO
<michael.pinto@total.com>
11/15/2010 02:46 PM

To Carolyn Bury
cc
bcc
Subject Arkame East Plant Bi-Monthly Report

Carolyn,

Attached is the bi-monthly progress report for the Arkema East Plant in Wyandotte/Riverview Michigan.
A hard copy will follow by regular mail.

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439



progress report 124.pdf

EPA-R5-2015-002106-48

Carolyn Bury /R5/USEPA/US

11/15/2010 03:21 PM

To Michael PINTO

cc

bcc

Subject Re: Arkame East Plant Bi-Monthly Report

Thanks Mike.

To be clear, the agreement for the Feasibility Study/Data Gap Analysis was signed in September and GLNPO will be preparing the FS? Is the "Project Agreement" the next phase of the GLLA project?

Carolyn

Carolyn Bury

Environmental Scientist

RCRA Corrective Action Program

Land and Chemicals Division

U.S. EPA Region Five

77 W. Jackson Blvd. LU-9J

Chicago, IL 60604

312-886-3020

bury.carolyn@epa.gov

-----Michael PINTO <michael.pinto@total.com> wrote: -----

To: Carolyn Bury/R5/USEPA/US@EPA

From: Michael PINTO <michael.pinto@total.com>

Date: 11/15/2010 02:46PM

Subject: Arkame East Plant Bi-Monthly Report

Carolyn,

Attached is the bi-monthly progress report for the Arkema East Plant in Wyandotte/Riverview Michigan.
A hard copy will follow by regular mail.

Michael J. Pinto

Legacy Site Services

468 Thomas Jones Way, Suite 150

Exton, PA 19341-2528

Phone: (610) 594-4435

Fax: (610) 594-4439

[attachment "progress report 124.pdf" removed by Carolyn Bury/R5/USEPA/US]

EPA-R5-2015-002106-49

Michael PINTO
<michael.pinto@total.com>
11/15/2010 03:33 PM

To Carolyn Bury
cc
bcc
Subject RE: Arkame East Plant Bi-Monthly Report

The Project Agreement I was referring to is the agreement to perform the Feasibility/Data Gap Analysis. First we submitted an application, then the application was accepted, then we signed the Project Agreement in September. The next major step is to complete the work plan. GLNPO will be preparing the FS. LSS and BASF will be performing the bathymetric study, the transport modeling, and the database activities as part of our contribution. The remediation goals and methods will be determined by GLNPO in the FS, with input from LSS and BASF. GLNPO initially thought we would begin sampling this year, but the Mudpuppy was tied up (I think by RCRA for work at BASF) so the sampling has been pushed until the spring.

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439

From: Bury.Carolyn@epamail.epa.gov [mailto:Bury.Carolyn@epamail.epa.gov]
Sent: Monday, November 15, 2010 4:22 PM
To: Michael PINTO
Subject: Re: Arkame East Plant Bi-Monthly Report

Thanks Mike.
To be clear, the agreement for the Feasibility Study/Data Gap Analysis was signed in September and GLNPO will be preparing the FS? Is the "Project Agreement" the next phase of the GLLA project?

Carolyn
Carolyn Bury
Environmental Scientist
RCRA Corrective Action Program
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

-----Michael PINTO <michael.pinto@total.com> wrote: -----

To: Carolyn Bury/R5/USEPA/US@EPA
From: Michael PINTO <michael.pinto@total.com>
Date: 11/15/2010 02:46PM
Subject: Arkame East Plant Bi-Monthly Report
Carolyn,

Attached is the bi-monthly progress report for the Arkema East Plant in Wyandotte/Riverview Michigan. A hard copy will follow by regular mail.

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439

[attachment "progress report 124.pdf" removed by Carolyn Bury/R5/USEPA/US]

EPA-R5-2015-002106-50

Carolyn Bury /R5/USEPA/US

11/15/2010 03:39 PM

To Michael PINTO

cc

bcc

Subject RE: Arkame East Plant Bi-Monthly Report

OK. I think that you forgot to update the language under "other activities" in sections I and II of the project report.

CB

Carolyn Bury

Environmental Scientist

RCRA Corrective Action Program

Land and Chemicals Division

U.S. EPA Region Five

77 W. Jackson Blvd. LU-9J

Chicago, IL 60604

312-886-3020

bury.carolyn@epa.gov

-----Michael PINTO <michael.pinto@total.com> wrote: -----

To: Carolyn Bury/R5/USEPA/US@EPA

From: Michael PINTO <michael.pinto@total.com>

Date: 11/15/2010 03:33PM

Subject: RE: Arkame East Plant Bi-Monthly Report

The Project Agreement I was referring to is the agreement to perform the Feasibility/Data Gap Analysis. First we submitted an application, then the application was accepted, then we signed the Project Agreement in September. The next major step is to complete the work plan. GLNPO will be preparing the FS. LSS and BASF will be performing the bathymetric study, the transport modeling, and the database activities as part of our contribution. The remediation goals and methods will be determined by GLNPO in the FS, with input from LSS and BASF. GLNPO initially thought we would begin sampling this year, but the Mudpuppy was tied up (I think by RCRA for work at BASF) so the sampling has been pushed until the spring.

Michael J. Pinto

Legacy Site Services

468 Thomas Jones Way, Suite 150

Exton, PA 19341-2528

Phone: (610) 594-4435

Fax: (610) 594-4439

From: Bury.Carolyn@epamail.epa.gov [mailto:Bury.Carolyn@epamail.epa.gov]
Sent: Monday, November 15, 2010 4:22 PM
To: Michael PINTO
Subject: Re: Arkame East Plant Bi-Monthly Report

Thanks Mike.

To be clear, the agreement for the Feasibility Study/Data Gap Analysis was signed in September and GLNPO will be preparing the FS? Is the "Project Agreement" the next phase of the GLLA project?

Carolyn

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Program
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

-----Michael PINTO <michael.pinto@total.com> wrote: -----

To: Carolyn Bury/R5/USEPA/US@EPA
From: Michael PINTO <michael.pinto@total.com>
Date: 11/15/2010 02:46PM
Subject: Arkame East Plant Bi-Monthly Report

Carolyn,

Attached is the bi-monthly progress report for the Arkema East Plant in Wyandotte/Riverview Michigan.
A hard copy will follow by regular mail.

Michael J. Pinto

Legacy Site Services

468 Thomas Jones Way, Suite 150

Exton, PA 19341-2528

Phone: (610) 594-4435

Fax: (610) 594-4439

[attachment "progress report 124.pdf" removed by Carolyn Bury/R5/USEPA/US]

EPA-R5-2015-002106-51

Michael PINTO
<michael.pinto@total.com>
11/15/2010 03:47 PM

To Carolyn Bury
cc
bcc
Subject RE: Arkame East Plant Bi-Monthly Report

Sorry,

It looks like a converted the wrong draft to pdf. Here's a revised report. Sorry for the inconvenience.

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439

From: Bury.Carolyn@epamail.epa.gov [mailto:Bury.Carolyn@epamail.epa.gov]
Sent: Monday, November 15, 2010 4:40 PM
To: Michael PINTO
Subject: RE: Arkame East Plant Bi-Monthly Report

OK. I think that you forgot to update the language under "other activities" in sections I and II of the project report.

CB
Carolyn Bury
Environmental Scientist
RCRA Corrective Action Program
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

-----Michael PINTO <michael.pinto@total.com> wrote: -----

To: Carolyn Bury/R5/USEPA/US@EPA
From: Michael PINTO <michael.pinto@total.com>
Date: 11/15/2010 03:33PM
Subject: RE: Arkame East Plant Bi-Monthly Report

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Michael J. Pinto
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Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439

From: Bury.Carolyn@epamail.epa.gov [mailto:Bury.Carolyn@epamail.epa.gov]
Sent: Monday, November 15, 2010 4:22 PM
To: Michael PINTO
Subject: Re: Arkame East Plant Bi-Monthly Report

Thanks Mike.

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Carolyn
Carolyn Bury
Environmental Scientist
RCRA Corrective Action Program
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

-----Michael PINTO <michael.pinto@total.com> wrote: -----

To: Carolyn Bury/R5/USEPA/US@EPA
From: Michael PINTO <michael.pinto@total.com>
Date: 11/15/2010 02:46PM
Subject: Arkame East Plant Bi-Monthly Report
Carolyn,

Attached is the bi-monthly progress report for the Arkema East Plant in Wyandotte/Riverview Michigan. A hard copy will follow by regular mail.

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439

[attachment "progress report 124.pdf" removed by Carolyn Bury/R5/USEPA/US]



progress report 124.pdf

EPA-R5-2015-002106-52

Michael PINTO
<michael.pinto@total.com>

01/14/2011 02:50 PM

To Carolyn Bury

cc Bob WRIGHT

bcc

Subject Arkema Bi-monthly Report

Carolyn,

Attached is the bi-monthly progress report for the Arkema East Plant in Wyandotte/Riverview Michigan.
A hard copy will follow by regular mail.

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439



progress report 125.pdf

EPA-R5-2015-002106-53

Michael PINTO
<michael.pinto@total.com>

01/19/2011 10:44 AM

To Carolyn Bury

cc

bcc

Subject Voice Mail

Carolyn,

I called you this morning in and found that your voice mail box is full. I was responding to your call from last week since I was unable to reach you on Friday. Give me call if there's anything you would like to discuss. If you can't reach me at the office you can call my cell at 484-437-1991.

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439

EPA-R5-2015-002106-54

Michael PINTO
<michael.pinto@total.com>

03/10/2011 02:45 PM

To Carolyn Bury

cc

bcc

Subject Arkema East Plant Progress Report

Carolyn,

Attached is the January/February 2011 Progress Report for the Arkema East Plant. You will also receive a hard copy by regular mail.

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439



progress report 126.pdf

EPA-R5-2015-002106-55

Carolyn Bury /R5/USEPA/US

03/10/2011 03:17 PM

To Michael PINTO

cc

bcc

Subject Re: Arkema East Plant Progress Report

Hi Mike,

Sorry that I haven't been in touch much lately, I've been temporarily assigned to the Air Division since Dec 6. None of my Sites have been re-assigned. Please call me if you need anything.

Thanks.

Carolyn

Carolyn Bury
Energy Star Program Manager
Office of Air and Radiation
U.S. EPA Region Five
77 W. Jackson Blvd. AT-18J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

Michael PINTO

[Carolyn, Attached is the January/Febr...](#)

03/10/2011 02:46:22 PM

From: Michael PINTO <michael.pinto@total.com>
To: Carolyn Bury/R5/USEPA/US@EPA
Date: 03/10/2011 02:46 PM
Subject: Arkema East Plant Progress Report

Carolyn,

Attached is the January/February 2011 Progress Report for the Arkema East Plant. You will also receive a hard copy by regular mail.

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
Phone: (610) 594-4435
Fax: (610) 594-4439

[attachment "progress report 126.pdf" deleted by Carolyn Bury/R5/USEPA/US]

EPA-R5-2015-002106-56

Carolyn Bury /R5/USEPA/US

08/02/2011 02:00 PM

To bob.wright

cc

bcc

Subject PCB Article

Good to hear your voice, hope all is well. Article to read in your spare time -
CB

[attachment "1242 paper sludge weathering Saba 2011.pdf" deleted by Carolyn Bury/R5/USEPA/US]

EPA-R5-2015-002106-57

Carolyn Bury /R5/USEPA/US

10/27/2011 01:19 PM

To Mirtha Capiro

cc George Hamper

bcc

Subject Fw: Arkema Riverview West Plant Property - PCB Work

Carolyn Bury
Energy Star Program Manager
Office of Air and Radiation
U.S. EPA Region Five
77 W. Jackson Blvd. AT-18J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

----- Forwarded by Carolyn Bury/R5/USEPA/US on 10/27/2011 01:19 PM -----

From: Bob WRIGHT <bob.wright@arkema.com>
To: Carolyn Bury/R5/USEPA/US@EPA
Date: 10/27/2011 12:35 PM
Subject: Arkema Riverview West Plant Property - PCB Work

For your information, attached is a notification letter regarding start of PCB remediation site work at the Arkema West Plant Property in Riverview, Michigan. As indicated, the remediation contractor is scheduled to mobilize on or about November 7th, 2011 and site work is anticipated to last approximately 2 months.

Please let me know if you have questions or wish to discuss

Bob Wright
Arkema Inc.
900 First Ave.
King of Prussia, PA 19406

Phone 610.787.6250



EPA - Riverview PCB Work Notification Letter 10 27 11.pdf

EPA-R5-2015-002106-58

Carolyn Bury /R5/USEPA/US

04/04/2012 08:37 AM

To Bob WRIGHT

cc

bcc

Subject Re: Arkema Riverview West Plant Property - PCB Soil Remediation

Hi Bob,

I received the soil remediation document and looked through it yesterday but did not bring it home . I've just been asked to report on acres of PCB remedial activity and I recall that your document reports removal by tons and area by feet. Is there also an acreage estimate in there? Please let me know. (If not, I'll just plan on adding up the feet and calculating the fraction of acreage tomorrow).
Thanks.

Carolyn

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Section 2
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. AT-18J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

-----Bob WRIGHT <bob.wright@arkema.com> wrote: -----

To: Carolyn Bury/R5/USEPA/US@EPA
From: Bob WRIGHT <bob.wright@arkema.com>
Date: 03/13/2012 07:29AM
Cc: JeanMarie CENCETTI <jeanmarie.cencetti@arkema.com>
Subject: Arkema Riverview West Plant Property - PCB Soil Remediation

As discussed, the field activities related to the PCB soil remediation at the Arkema West Plant property in Riverview have been completed and the work was performed in accordance with the approved work plans. The report documenting the remediation activities and site conditions is in preparation. Per our recent conversation and as agreed, the final report will be submitted to the EPA by the end of March 2012.

In the interim please let me know if you wish to discuss the work or other activities at the site - thanks

Bob Wright
Arkema Inc.
900 First Ave
King of Prussia, PA 19406

phone: 610-878-6250

EPA-R5-2015-002106-59

Carolyn Bury /R5/USEPA/US

04/04/2012 09:31 AM

To Bob WRIGHT

cc

bcc

Subject Re: Arkema Riverview West Plant Property - PCB Soil Remediation

Thanks Bob.

Carolyn

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Section 2
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. AT-18J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

-----Bob WRIGHT <bob.wright@arkema.com> wrote: -----

To: Carolyn Bury/R5/USEPA/US@EPA

From: Bob WRIGHT <bob.wright@arkema.com>

Date: 04/04/2012 09:19AM

Subject: Re: Arkema Riverview West Plant Property - PCB Soil Remediation

The PCB remediation activity at the Arkema West Plant property in Riverview, Michigan consisted of excavation in 22 individual areas with a combined footprint of approximately 33,250 square feet which is about 0.76 acres. This work included the removal and proper off-site disposal of 3,486.5 tons of PCB impacted soil. In addition, the completed remediation includes the capping of one area (D-50) which has a foot print of 6,500 square feet or 0.15 acres.

Please let me know if you need further information or wish to discuss.

Bob Wright
Arkema Inc.
900 First Ave
King of Prussia, PA 19406

phone: 610-878-6250

From: Carolyn Bury <Bury.Carolyn@epamail.epa.gov>

To: Bob WRIGHT <bob.wright@arkema.com>

Date: 04/04/2012 09:37 AM

Subject: Re: Arkema Riverview West Plant Property - PCB Soil Remediation

Hi Bob,

I received the soil remediation document and looked through it yesterday but did not bring it home. I've just been asked to report on acres of PCB remedial activity and I recall that your document reports removal by tons and area by feet. Is there also an acreage estimate in there? Please let me know. (If not, I'll just plan on adding up the feet and calculating the fraction of acreage tomorrow).
Thanks.

Carolyn

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U.S. EPA Region Five
77 W. Jackson Blvd. AT-18J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

-----Bob WRIGHT <bob.wright@arkema.com> wrote: -----

To: Carolyn Bury/R5/USEPA/US@EPA
From: Bob WRIGHT <bob.wright@arkema.com>
Date: 03/13/2012 07:29AM
Cc: JeanMarie CENCETTI <jeanmarie.cencetti@arkema.com>
Subject: Arkema Riverview West Plant Property - PCB Soil Remediation

As discussed, the field activities related to the PCB soil remediation at the Arkema West Plant property in Riverview have been completed and the work was performed in accordance with the approved work plans. The report documenting the remediation activities and site conditions is in preparation. Per our recent conversation and as agreed, the final report will be submitted to the EPA by the end of March 2012.

In the interim please let me know if you wish to discuss the work or other activities at the site - thanks

Bob Wright
Arkema Inc.
900 First Ave
King of Prussia, PA 19406

phone: 610-878-6250

EPA-R5-2015-002106-60

**Cynthia
Kawakami/R5/USEPA/US**

04/04/2012 11:15 AM

To Carolyn Bury

cc

bcc

Subject Re: New Order(s) for Arkema CMI Phase- Separating
Arkema West Plant from East Plant

Hi Carolyn, I'll check around ORC to see if someone has done it before. My gut tells me that it is "do-able." Talk to you tomorrow at 11! Cynthia

Carolyn Bury

Hi Cynthia, I'm looking forward to talki...

04/04/2012 11:05:00 AM

From: Carolyn Bury/R5/USEPA/US
To: Cynthia Kawakami/R5/USEPA/US@EPA
Cc: Daniel Chachakis/R5/USEPA/US@EPA
Date: 04/04/2012 11:05 AM
Subject: New Order(s) for Arkema CMI Phase- Separating Arkema West Plant from East Plant

Hi Cynthia,

I'm looking forward to talking with you on Thursday about the Arkema Sites. As you know, East and West Plants have been treated separately for several years and the schedules of remedial activities will be on separate tracks. I've been speaking with the PM for the West Plant and they are anxious to get moving on the next phase. We previously discussed the topic of separating the facilities for the forthcoming CMI order(s). Would you look into the feasibility of doing this? There must be a precedent ...

I can also bring up this topic on the next CA national monthly call to ask about a precedent if you can't find one.

Thanks,

Carolyn

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Section 2
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

EPA-R5-2015-002106-61

Carolyn Bury /R5/USEPA/US

05/03/2012 12:24 PM

To Bob WRIGHT

cc JeanMarie CENCETTI

bcc

Subject Re: Arkema Riverview West Plant Property - PCB Soil Remediation

Hi Bob,

I checked in with management, and there is no expectation that we formally approve documents like the PCB Remediation Completion Report, unless an approval is specifically requested. I read through the report and find it acceptable. Please let me know if you need a letter so stating.

Thanks.

Carolyn

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Section 2
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

Bob WRIGHT

As discussed, the field activities related...

03/13/2012 07:29:44 AM

From: Bob WRIGHT <bob.wright@arkema.com>
To: Carolyn Bury/R5/USEPA/US@EPA
Cc: JeanMarie CENCETTI <jeanmarie.cencetti@arkema.com>
Date: 03/13/2012 07:29 AM
Subject: Arkema Riverview West Plant Property - PCB Soil Remediation

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In the interim please let me know if you wish to discuss the work or other activities at the site - thanks

Bob Wright
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King of Prussia, PA 19406

phone: 610-878-6250

EPA-R5-2015-002106-62

Carolyn Bury /R5/USEPA/US

05/03/2012 04:31 PM

To Bob WRIGHT

cc JeanMarie CENCETTI

bcc

Subject Re: Arkema Riverview West Plant Property - PCB Soil Remediation

Bob,

The attached file is a letter acknowledging receipt of the PCB Completion Report dated March 2, 2012. Please let me know if you have any questions.

Carolyn



May 3, 2012 Remediation Report Acknowledgement Letter.pdf

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Section 2
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

EPA-R5-2015-002106-63

Carolyn Bury /R5/USEPA/US

05/03/2012 05:21 PM

To bob.wright

cc

bcc

Subject RFI Question

Bob,

What work plan was followed for the RFI? Was it the Weston Work Plan revised Aug 1995?

Thanks.

Carolyn

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Section 2
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

EPA-R5-2015-002106-64

Michael PINTO
<michael.pinto@total.com>
05/04/2012 02:03 PM

To Amy Mucha
cc Carolyn Bury
bcc
Subject East Plant Data

Amy,

In a discussion I had today with Carolyn Bury she mentioned that you may be missing some Arkema sediment data collected in the 2005-2006 timeframe. I have a Sediment Survey report dated December 2005 and a Supplemental Sediment Survey Report dated November 2006. These reports include all the sediment data collected by LSS/Arkema. Do you need either of these report resent to you?

Michael Pinto
RETIA USA LLC/Legacy Site Services LLC
468 Thomas Jones Way, Suite 150
Exton, PA 19341
Office: 610 594-4435
Fax: 610 594-4439



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Carolyn Bury /R5/USEPA/US

05/10/2012 10:06 AM

To Bob WRIGHT

cc

bcc

Subject Site Visit West Plant

Bob,

I would like to come and see the site. Travel money is tight but if the travel is approved I would also visit East Plant. Are there dates in June or July that would suit you?

Thanks.

Carolyn

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Section 2
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312-886-3020
bury.carolyn@epa.gov

EPA-R5-2015-002106-66

Carolyn Bury /R5/USEPA/US

05/14/2012 02:36 PM

To "Bob WRIGHT"

cc

bcc

Subject Re: Site Visit West Plant

OK, not sure how I'd get there. I'm waiting for my travel to be approved.
cb

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Section 2
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

-----Bob WRIGHT <bob.wright@arkema.com> wrote: -----

To: Carolyn Bury/R5/USEPA/US@EPA

From: Bob WRIGHT <bob.wright@arkema.com>

Date: 05/10/2012 11:35AM

Subject: Re: Site Visit West Plant

End of June is bad, so by June 14 or after July 4 would be best for me.

Are you planning to drive, train or fly?

From: Carolyn Bury <Bury.Carolyn@epamail.epa.gov>

To: Bob WRIGHT <bob.wright@arkema.com>

Date: 05/10/2012 11:05 AM

Subject: Site Visit West Plant

Bob,

I would like to come and see the site. Travel money is tight but if the travel is approved I would also visit East Plant. Are there dates in June or July that would suit you?

Thanks.

Carolyn

Carolyn Bury
Environmental Scientist
RCRA Corrective Action Section 2
Land and Chemicals Division

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bury.carolyn@epa.gov

EPA-R5-2015-002106-67

Carolyn Bury /R5/USEPA/US

07/03/2012 10:34 AM

To Bob WRIGHT

cc

bcc

Subject Re: Riverview Visit

Hi Bob,

Yes, still coming next week. Driving to Detroit area on July 10, site visit(s) - East Plant, too?? - July 11 in the sweltering heat, driving home on July 11 in air conditioned splendor.

Carolyn

Carolyn Bury
Project Manager/Ecologist
RCRA Corrective Action Section 2
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

Bob WRIGHT

Just checking if you are still planning to...

07/02/2012 01:47:04 PM

From: Bob WRIGHT <bob.wright@arkema.com>
To: Carolyn Bury/R5/USEPA/US@EPA,
Date: 07/02/2012 01:47 PM
Subject: Re: Riverview Visit

Just checking if you are still planning to come to the Riverview Michigan facility . If so, could you confirm the schedule?

EPA-R5-2015-002106-68

Carolyn Bury /R5/USEPA/US

07/03/2012 03:47 PM

To Bob WRIGHT

cc

bcc

Subject Re: Riverview Visit

OK, let's plan on having dinner. I'll send you my cell phone number later this week (my son lost my phone, hopefully it will be recovered).

Carolyn Bury
Project Manager/Ecologist
RCRA Corrective Action Section 2
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

Bob WRIGHT

Good, I will plan to see you next week....

07/03/2012 10:55:28 AM

From: Bob WRIGHT <bob.wright@arkema.com>
To: Carolyn Bury/R5/USEPA/US@EPA,
Date: 07/03/2012 10:55 AM
Subject: Re: Riverview Visit

Good, I will plan to see you next week.

I let Mike Pinto of LSS know you were coming. I do not mind getting on and driving around the East Plant property, but if you want and technical information or background you need to talk to Mike.

Regarding the travel, I will be in Tuesday afternoon, so if you get to Detroit early enough maybe we could meet for dinner, just let me know.

Also I believe you asked about hotels. Best place to stay is near the airport (DTW). The Hilton Garden Inn and Marriott Courtyard are ok. There is also a new Embassy Suites that looks good, but I have not stayed there yet.

From: Carolyn Bury <Bury.Carolyn@epamail.epa.gov>
To: Bob WRIGHT <bob.wright@arkema.com>
Date: 07/03/2012 11:34 AM
Subject: Re: Riverview Visit

Hi Bob,

Yes, still coming next week. Driving to Detroit area on July 10, site visit(s) - East Plant, too?? - July 11 in the sweltering heat, driving home on July 11 in air conditioned splendor.

Carolyn

Carolyn Bury
Project Manager/Ecologist
RCRA Corrective Action Section 2
Land and Chemicals Division
U.S. EPA Region Five
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Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

▼ Bob WRIGHT ---07/02/2012 01:47:04 PM---Just checking if you are still planning to come to the Riverview Michigan facility . If so, could y

From: Bob WRIGHT <bob.wright@arkema.com>
To: Carolyn Bury/R5/USEPA/US@EPA,
Date: 07/02/2012 01:47 PM
Subject: Re: Riverview Visit

Just checking if you are still planning to come to the Riverview Michigan facility . If so, could you confirm the schedule?

EPA-R5-2015-002106-69

Carolyn Bury /R5/USEPA/US

07/05/2012 04:17 PM

To Bob WRIGHT

cc

bcc

Subject Re: Riverview Visit

I ended up booking at the Hilton Garden Inn at the airport, FYI.
CB

Carolyn Bury
Project Manager/Ecologist
RCRA Corrective Action Section 2
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

Bob WRIGHT

Good, I will plan to see you next week....

07/03/2012 10:55:28 AM

From: Bob WRIGHT <bob.wright@arkema.com>
To: Carolyn Bury/R5/USEPA/US@EPA,
Date: 07/03/2012 10:55 AM
Subject: Re: Riverview Visit

Good, I will plan to see you next week.

I let Mike Pinto of LSS know you were coming. I do not mind getting on and driving around the East Plant property, but if you want and technical information or background you need to talk to Mike.

Regarding the travel, I will be in Tuesday afternoon, so if you get to Detroit early enough maybe we could meet for dinner, just let me know.

Also I believe you asked about hotels. Best place to stay is near the airport (DTW). The Hilton Garden Inn and Marriott Courtyard are ok. There is also a new Embassy Suites that looks good, but I have not stayed there yet.

From: Carolyn Bury <Bury.Carolyn@epamail.epa.gov>
To: Bob WRIGHT <bob.wright@arkema.com>
Date: 07/03/2012 11:34 AM
Subject: Re: Riverview Visit

Hi Bob,

Yes, still coming next week. Driving to Detroit area on July 10, site visit(s) - East Plant, too?? - July 11 in the sweltering heat, driving home on July 11 in air conditioned splendor.

Carolyn

Carolyn Bury
Project Manager/Ecologist
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312-886-3020
bury.carolyn@epa.gov

▼ Bob WRIGHT ---07/02/2012 01:47:04 PM---Just checking if you are still planning to come to the Riverview Michigan facility . If so, could y

From: Bob WRIGHT <bob.wright@arkema.com>
To: Carolyn Bury/R5/USEPA/US@EPA,
Date: 07/02/2012 01:47 PM
Subject: Re: Riverview Visit

Just checking if you are still planning to come to the Riverview Michigan facility . If so, could you confirm the schedule?

EPA-R5-2015-002106-70

Carolyn Bury /R5/USEPA/US

10/09/2012 05:14 PM

To michael.pinto

cc

bcc

Subject PCN ecorisk info

Mike,

As we discussed earlier today, there is not a lot to draw from for a remedial action objective for chlorinated naphthalene but we could still develop one.

1) See this URL for Canada's discussion of PCN/Halowax including the bioaccumulative and bioconcentrating characteristics.

<http://www.ec.gc.ca/ese-ees/default.asp?lang=En&n=835522FE-1>

I'm going to look at some of the papers listed in the reference section (note that the Trenton Channel is mentioned in the assessment). This paper looks interesting =
<http://159.226.238.44/bitstream/321008/115544/1/20111QOK1iZ6RZ.pdf>

2) 417 ppb = EPA Region 5 sediment screening value for chloronaphthalene, beta-. Value is based on equilibrium partitioning approach using the water quality standard protective of wildlife. In this case the water ESL used was based on the mink's potential for bioaccumulation of organic pollutants along the aquatic food chain in terrestrial receptors.

I'm going to poke around some more and ask the Ecological Risk Assessment Forum whether anyone has developed a sediment action level for PCNs.

Carolyn

Carolyn Bury
Project Manager/Ecologist
RCRA Corrective Action Section 2
Land and Chemicals Division
U.S. EPA Region Five
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Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

EPA-R5-2015-002106-71

Michael PINTO
<michael.pinto@total.com>
10/11/2012 06:11 PM

To Carolyn Bury
cc
bcc
Subject Halowax Flow Stats

Carolyn,

Pete Swanson at CRA was not in today so he was not able to pull together the halowax area flow data you requested. He says he will email it to you tomorrow. I apologize for the delay.

Michael Pinto
RETIA USA LLC/Legacy Site Services LLC
468 Thomas Jones Way, Suite 150
Exton, PA 19341
Office: 610 594-4435
Fax: 610 594-4439



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Carolyn Bury /R5/USEPA/US

10/12/2012 08:17 AM

To Michael PINTO

cc

bcc

Subject Re: Halowax Flow Stats

Thanks Mike.

Carolyn Bury
Project Manager/Ecologist
RCRA Corrective Action Section 2
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

Michael PINTO

Carolyn, Pete Swanson at CRA was n...

10/11/2012 06:11:51 PM

From: Michael PINTO <michael.pinto@total.com>
To: Carolyn Bury/R5/USEPA/US@EPA,
Date: 10/11/2012 06:11 PM
Subject: Halowax Flow Stats

Carolyn,

Pete Swanson at CRA was not in today so he was not able to pull together the halowax area flow data you requested. He says he will email it to you tomorrow. I apologize for the delay.

Michael Pinto
RETIA USA LLC/Legacy Site Services LLC
468 Thomas Jones Way, Suite 150
Exton, PA 19341
Office: 610 594-4435
Fax: 610 594-4439



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EPA-R5-2015-002106-73

Michael PINTO
<michael.pinto@total.com>
10/12/2012 08:17 AM

To Carolyn Bury
cc
bcc

Subject Halowax Information - Oct 2011 - Sept 2012

Carolyn,

Here are the volumes you requested:

Total volume treated (Oct 2011 – Sept 2012) – 93,840 gallons

Gallons of DNAPL Collected (Oct 2011 – Sept 2012) – ~10 gallons

Michael Pinto
RETIA USA LLC/Legacy Site Services LLC
468 Thomas Jones Way, Suite 150
Exton, PA 19341
Office: 610 594-4435
Fax: 610 594-4439



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Carolyn Bury /R5/USEPA/US

10/15/2012 10:12 AM

To "Mike Pinto"

cc

bcc

Subject MID 005 363114 Progress Report Submittal Mode

Hi Mike,

Per our discussion last week, please begin to submit the bi-monthly progress reports for the Arkema East plant via pdf and email. They no longer need to be submitted using certified mail. Please let me know if you have any questions.

Carolyn

Carolyn Bury
Project Manager/Ecologist
RCRA Corrective Action Section 2
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

EPA-R5-2015-002106-75

Michael PINTO
<michael.pinto@total.com>
11/14/2012 01:02 PM

To Carolyn Bury
cc Bob WRIGHT
bcc
Subject East Plant Progress Report

Carolyn,

Attached please find the September/October 2012 Bi-Monthly Progress Report for the Arkema East



Plant in Wyandotte, Michigan. September October 2012.pdf

EPA-R5-2015-002106-76

Carolyn Bury /R5/USEPA/US

11/14/2012 01:18 PM

To Cynthia Kawakami

cc

bcc

Subject Re: Fw: Arkema Corrective Action

Hi Cynthia,

I am available the rest of today (after 2:15), Th and Friday. The week after TG, I am at a training conference in NV. The first week in Dec looks ok so far after Mon, Dec 3. Tuesday that week in the afternoon might be good. I'd prefer this week, though, if that's do-able.

Would you like to get together tomorrow to discuss the site?

Carolyn

Carolyn Bury
Project Manager/Ecologist
RCRA Corrective Action Section 2
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020
bury.carolyn@epa.gov

-----Cynthia Kawakami/R5/USEPA/US wrote: -----

To: Carolyn Bury/R5/USEPA/US@EPA
From: Cynthia Kawakami/R5/USEPA/US
Date: 11/14/2012 12:44PM
Subject: Fw: Arkema Corrective Action

Hi Carolyn, looks like Arkema (Karen Davis and Mike Pinto) wants to talk to us. Toward that end, could you provide me with some dates and time that might work best for a call with Arkema? Next week, Thanksgiving week, is not good for me. The following week, I am available on Tuesday, 11/27 after 2 p.m., Wednesday 11/28 after 11 a.m., Thursday 11/29 from 11 a.m.- 12:20 p.m. and then from 3 p.m. on. The first full week of December, I am available on Monday, 12/2 any time by phone, Tuesday, 12/03 after 2 p.m., and Wednesday, 12/5 after 11 a.m. Thanks. Cynthia

p.s. before talking with them, I would like to have a planning meeting with you first to prep for the call.

----- Forwarded by Cynthia Kawakami/R5/USEPA/US on 11/14/2012 12:31 PM -----

From: Karen DAVIS <karen.davis@external.total.com>
To: Cynthia Kawakami/R5/USEPA/US@EPA,
Cc: Michael PINTO <michael.pinto@total.com>
Date: 11/14/2012 09:32 AM
Subject: Arkema Corrective Action

Cynthia,

Hi. As I indicated in my voicemail, Mike Pinto and I would like to schedule a conference call with you and Carolyn Bury to discuss the Arkema Corrective Action and the GLNPO UTC project . We have some questions on the RCRA Corrective Action timing and process . We spoke to Amy Mucha and Craig Melodia and they suggested that we discuss these topics with you and Carolyn.

Can you let us know some dates and times that would work for you and Carolyn ?

Thanks

Karen

Karen H. Davis
Of Counsel
Legacy Site Services LLC
Agent for Arkema Inc.
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528
610 594-4436
karen.davis@total.com

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EPA-R5-2015-002106-77

Carolyn Bury /R5/USEPA/US

11/21/2012 07:38 AM

To "Mike Pinto"

cc

bcc

Subject UTC

Hi Mike,

Amy asked whether she could share the attached memo with you. I responded that she could, however, she appears to be out of the office until sometime next week. As I was going to send you the "guts" of the memo anyway, here is a copy. If you want to discuss the memo, please give me a call.

Have a great Thanksgiving holiday and safe travels.

Carolyn

Carolyn Bury
Project Manager/Ecologist
RCRA Corrective Action Section 2
Land and Chemicals Division
U.S. EPA Region Five
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604
312-886-3020



bury.carolyn@epa.gov11-20-12 Memo to Amy re CA expectations for UTC.docx

EPA-R5-2015-002106-78

Michael PINTO
<michael.pinto@total.com>
01/15/2013 03:09 PM

To Carolyn Bury
cc Bob WRIGHT
bcc
Subject Arkema Progress Report

Carolyn,

Attached please find the November/December 2012 Bi-Monthly Progress Report for the Arkema East Plant in Wyandotte, Michigan.

Michael Pinto
RETIA USA LLC/Legacy Site Services LLC
468 Thomas Jones Way, Suite 150
Exton, PA 19341
Office: 610 594-4435
Fax: 610 594-4439



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November December 2012.pdf